

STARBUCKS PRIVACY STATEMENT

Last updated: 10 December 2024

At Starbucks, we approach data and privacy as we approach everything we do: we put people first.

We believe that taking care of you includes taking care of your data and privacy. Grab a cup of coffee and learn more below.

Overview

This Starbucks Privacy Statement describes the types of personal information that we collect, how we use it, how and when it is shared, and the choices and rights you have with respect to your information. It also explains how we communicate with you and how you can make requests or submit inquiries to us about your information. Thank you for taking the time to read and understand our data and privacy related practices.

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This Privacy Statement ("Statement") applies to the microsite located at <https://starbucks.onecupbigchange.com/>

Starbucks EMEA Limited ("Starbucks EMEA") is the controller in relation to information collected on the website.

Updates to this Privacy Statement

This Statement went into effect on the "Last Updated" date noted near the top of this page. Starbucks EMEA may update this Statement from time to time. When it does so, it will notify you of any modifications to this Statement that might materially affect your rights or the way that we use or disclose your personal information prior to the change becoming effective by means of a message on this microsite. We encourage you to look for updates and changes to this Statement by checking the "Last Updated" date when you access our microsite.

Information We Collect

As you use our microsities, we collect automatically collect certain information including:

Geolocation Information. Such as precise or approximate location determined from your IP address, mobile or other device's GPS, or other information you share with us, depending on your device settings.

Usage Information. Such as information about your actions on the microsite, including the pages or content you view.

Device Information. Such as IP address, and hardware and software information.

How We Use Your Information

We use your information to facilitate the functionality of the microsite.

We rely on the following legal basis to process your personal information for this purpose:

- **To Conclude or Perform Our Contract With You.**

We may also process certain personal information in our legitimate business interests, for example:

For Research, Development, and Improvement of Our Services. We want to ensure that our microsite and services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we process certain personal information, including to:

- maintain, improve, and analyze our microsities, ads, and the products and services we offer; and

- detect, prevent, or investigate suspicious activity or fraud.

To Enforce our Terms, Agreements, or Policies. To maintain a safe, secure, and trusted environment for you when you use our websites, microsites, and other services, we use your personal information to ensure our terms, policies, and agreements with you and any third parties are enforced.

How We Share Your Information

We share your information as needed to fulfill the purposes described in this Privacy Statement and as permitted by applicable law. This includes sharing among affiliated entities for internal business purposes, sharing with service providers to help perform business functions at our direction, sharing with your consent, sharing for marketing purposes, sharing as part of corporate transactions, and sharing to protect lawful interests.

We share personal information in the following circumstances:

(a) When We Work Together – We share information with subsidiaries and affiliated companies, including Starbucks Corporation, for fraud monitoring and services and other business purposes. For example, in some cases, we share personal information to expand and promote our product and service offerings.

(b) When We Work with Service Providers – We share your information with service providers that provide us with support services, such as: website and Application hosting and management; customer care services (such as assistance with responding to data subject access requests); email and postal delivery; location mapping; product and service delivery; fraud monitoring; analytics services; and conducting academic research. We contractually limit these service providers from retaining, using, or disclosing your confidential personal information for any purpose other than performing agreed upon services for us.

(c) When We Work on Business Transactions – If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.

(d) When Sharing Helps Us Protect Safety and Lawful Interests – We disclose personal information if we believe that the disclosure is required by law or legal process, if we believe that the disclosure is necessary to enforce our agreements or policies, or if we believe that the disclosure will help us protect the rights, property, health or safety of Starbucks or our customers or partners.

Your choices and rights

Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you.

Request correction of the personal information that we hold about you.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information in certain circumstances (e.g., where there is no good reason for us continuing to process it).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party), or where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you.

Request the transfer of your personal information to another party, when possible.

You can exercise these rights by contacting us as described in the **Contact Us** section below and specifying which GDPR privacy right(s) you wish to exercise. We must verify your identity in order to honor your request, which we will respond to within one month.

How We Protect Your Information

We protect your information using technical, physical, and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure or modification of your information.

However, no security system is perfect, and due to the inherent nature of the Internet, we cannot guarantee that data, including personal information, is absolutely safe from intrusion or other unauthorized access by others. You are responsible for maintaining the security of your devices.

Retention and Disposal of Your Information

We store personal information as needed to accomplish the purposes identified in this Privacy Statement and to meet legal requirements, including record retention, resolving disputes, and enforcing our agreements. Our retention of your personal information is governed by applicable law. This storage period may extend beyond the term of your relationship with us.

As a general rule, we keep your data for only as long as it is needed to complete the purpose for which it was collected or as required by law. We may need to keep your data for longer than our specified retention periods to honor your requests, or to comply with legal, regulatory, accounting or other obligations. When personal information is no longer

needed, or in any event, after legal authority to retain it has expired, personal information will be destroyed, in accordance with local law and pursuant to procedures established in relation to the relevant system or process.

Children

We do not intend for our websites, microsites or online services to be used by anyone under the age of 13. If you are a parent or guardian and believe we may have collected information about your child, please contact us immediately as described in the "Contact Us" section of this statement. For the more information, please see our [Terms of Use](#).

International Transfers

Your personal information may be transferred to, stored, and processed in a country other than the one in which it was collected, including the United States. It may also be processed by staff operating outside the EEA who work for Starbucks or for our third-party service providers. In such cases, we will take appropriate steps to ensure an adequate level of data protection of the recipient as required under the GDPR, including by putting in place standard contractual clauses that have been approved by the European Commission. You may obtain a copy of these clauses by contacting our DPO (see the **Contact Us** section below).

Contact Us

We welcome your questions, comments and concerns about privacy. To get in touch with our Customer Care team you can submit a query [here](#) or by postal mail at: Starbucks EMEA Ltd, Building 7 Chiswick Park, 566 Chiswick High Road, London, W4 5YE or our Data Protection Officer at privacy@starbucks.com.

You have a right to submit any rights request to Starbucks EMEA Limited.

If you have any issues with our compliance, you have the right to lodge a complaint with an EEA supervisory authority [here](#) in the country in which you live or work. We would appreciate the opportunity to first address your concerns and would welcome you directing an inquiry first to us per the "Contact Us" section below. You may also contact the Starbucks Data Protection Officer ("DPO") at any time at privacy@starbucks.com.